

Submission Eirgrid
Seamus Healy
to:
Seamus Healy
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From: Seamus Healy/Members/Oireachtas

To: Seamus Healy/Members/Oireachtas@HOUSES

SUBMISSION TO EIRGRID

WUA Submission to Eirgrid on Pylons and Over-ground Power Lines

Summary

Workers and Unemployed Action is opposed to proposed power transmission taking place through over-ground power lines supported by pylons. WUA insists the proposed power transmission take place through shielded lines underground and undersea, in accordance with best international practice.

We call on Eirgrid and the Government to defer the closing date for submissions and to suspend this project pending the outcome of a comprehensive feasibility study, risk assessment, and environmental impact assessment, carried out **independently** of Eirgrid and the Department of Communications, Energy, and Natural Resources, into the laying of these lines underground and under sea and the carrying of these lines on pylons over-ground ---- The International Agency for Research on Cancer states that the magnetic fields due to the overground lines are possibly carcinogenic to humans, based on consistent statistical associations of high level residential magnetic fields, with the doubling of the risk of childhood leukaemia. In view of the fact that EirGrid cannot guarantee that there are no health issue involved in this, and in view of the fact that national and international studies raise serious doubts and health issues about these overhead lines, **Eirgrid and the Government must institute the Precautionary Principle** which has been adopted by the EU and the World Health Organization.

Eirgrid and ultimately the sovereign Government must ensure that the EirGrid proposal to erect overhead high voltage power lines is cancelled and the transmission takes place through shielded lines underground and undersea, in accordance with best international practice.

Submission

Communities across the country are convulsed at EirGrid's proposals to erect high voltage 400 kV overhead power lines. There is huge concern, frustration and anger at the Grid25 proposal across the Munster counties of Cork, Tipperary, Waterford and the Leinster counties of Wexford, Kilkenny, Carlow and Kildare. Thousands of people have turned out at public meetings. EirGrid, on the cusp of Christmas, has also now dispatched maps with pylon positions, access routes and stringing line areas to landowners across Meath, Cavan and Monaghan and given notice of its intentions to re-submit a planning application to An Bord Pleanála in early 2014 to erect over 400 giant pylons across Meath, Cavan, Monaghan, Armagh and Tyrone. There is naturally wide concern in these counties. It has now emerged that Eirgrid is seeking European clearance for further additional and similar systems in other parts of the country including the Dublin area.

This country needs top quality electrical infrastructure. What is at issue is the manner of the delivery of that infrastructure and the proposal in this regard, namely, the erection of 750 monster pylons along a 250 km route. These pylons will be 45 metres high, ten times the height of the average bungalow, and will be erected at 330 metre intervals. EirGrid has stated that **where possible** these pylons will be located 50 metres away from houses. Residents along the route will have to live with these pylons 24 hours a day, seven days a week, 365 days a year for the remainder of their lives.

This infrastructure will blight the landscape for Irish citizens and visitors alike and will seriously damage our tourism industry.

Some of the most scenic areas in County Tipperary are affected, including the Galtee-Knockmealdown Valley, the heritage town of Cahir, the Golden Vale into Clonmel, the Valley of Slievenamon, the Suir Valley into Faugheen and Carrick-on-Suir and on into Waterford. The Comeragh Mountain Range, with its communities, its special areas of conservation and habitats will be affected.

Health Issues

There is serious evidence that the proposed power lines can damage the health of human beings in their vicinity.

Childhood leukaemia close to high-voltage

power lines – the Geocap study, 2002–2007

*C Sermage-Faure^{1,2}, C Demoury^{1,2}, J Rudant^{1,2,3}, S Goujon-Bellec^{1,2,3}, A Guyot-Goubin^{1,2,3}, F Deschamps⁴,
D Hemon^{1,2} and J Clavel^{*,1,2,3}*

¹Inserm, Center for Research in Epidemiology and Population Health (CESP), U1018, Environmental Epidemiology of Cancer

Team, Villejuif F-94807, France; ²Univ Paris-Sud, UMRS 1018, Villejuif F-94807, France; ³French National Registry of Childhood

Hematological Malignancies (NRCH), Villejuif, France and ⁴Re´seau de Transport d'Electricite´ (RTE), Coeur De´fense, 110 esplanade

du Général de Gaulle, La Defense 92030, France

International Agency for Research on Cancer The International Agency for Research on Cancer (IARC; French: CIRC) is an intergovernmental agency forming part of the World Health Organisation of the United Nations. : "ELF magnetic fields are possibly carcinogenic to humans, based on consistent statistical associations of high level residential magnetic fields with a doubling of risk of childhood leukaemia."

What an Irish expert group said in 2007(Inter-departmental Committee on the Health Effects of Electromagnetic Fields, in September 2005): "There is limited scientific evidence of an association between ELF magnetic fields and childhood leukaemia. This does not mean that ELF magnetic fields cause cancer, but the possibility cannot be excluded... Overall the evidence is considered weak... Nevertheless the evidence should not be discounted."

What Europe says: The Scientific Committee on Emerging and Newly Identified Health Risks The Scientific Committee on Emerging and Newly Identified Health Risks (abbreviated SCENIHR) is one of the independent scientific committees managed by the Directorate-General for Health and Consumer Protection of the European Commission, which provide scientific advice to the Commission on issues related to consumer products says "extremely low frequency magnetic fields are a possible carcinogen" and "might contribute to an increase in childhood leukaemia". Studies indicating a "possible increase in Alzheimers disease arising from exposure to extremely low frequency fields" warranted further investigation.

Misleading

The following statement by Tanaiste, Eamonn Gilmore in the Dáil on November 12, 2013 is typical of misleading statements made by Eirgrid and government spokespersons; "There is a quite a degree of both national and international reviews of the likely health effects, none of which reaches the conclusions Deputy Healy has put on record." Leaders Questions, Nov 12, Dáil Eireann

The health effects of these power lines can only be established over long periods of time. They cannot be established by laboratory experiment.

The onus is not on the objectors to prove conclusively that there are damaging health effects. Serious concerns have been raised by reputable scientific bodies. The onus is now on Eirgrid and the government to ensure that these effects do not occur.

The Precautionary Principle must be implemented.

Precautionary Principle

"Where there is uncertainty as to the existence or extent of risks of serious or irreversible damage to the environment, or injury to human health, adequate protective measures must be taken without having to wait until the reality and seriousness of those risks become fully apparent."

*Architectural and Design Practice*¹

"The precautionary principle enables rapid response in the face of a possible danger to human, animal or plant health, or to protect the environment. In particular, where scientific data do not permit a complete evaluation of the risk, recourse to this principle may, for example, be used to stop distribution or order withdrawal from the market of products likely to be hazardous." *Europa Summaries of EU Legislation*²

There is ample evidence that there is at least "a possible danger to human health". Under the Precautionary Principle the Eirgrid proposal must not be implemented under any circumstances.

1 *Sustainable Design under Precautionary Principle* <http://www.sustainable-design.ie/arch/precautionaryprinciple.htm>

2 *Precautionary Principle Europe* http://europa.eu/legislation_summaries/consumers/consumer_safety/l32042_en.htm

Environmental Issues

The damage which would be done to the environment including the beauty of the countryside by these huge pylons is self-evident. The landscape of Ireland is the heritage of all Irish citizens. The suggestion that the pylons can be hidden away in unpopulated places is derisory. Such places are often among the most beautiful. In a tiny island the very presence of such structures cannot fail to damage scenic amenity.

Damage to scenic amenity cannot fail to damage the tourist industry in which very many of our citizens are employed.

Devaluation of Homes and Land

"A study carried out in Britain in 2007 showed the value of detached properties at a distance of less than 100m from overhead transmission lines was 38 percent lower than comparable properties". *North East Pylon Pressure*

The proximity of huge pylons and power lines with attendant health risks cannot fail to seriously devalue properties. At a time when many householders are in negative equity and many farmers are in difficulty with banks, the implementation of the Eirgrid proposals would be grossly unfair to these citizens. It can be safely said that any home from which these pylons can be seen will be significantly devalued.

INTERNATIONAL BEST PRACTICE

Worldwide, the use of underground transmission is increasing rapidly. Currently, there are approximately 5,500 km of high voltage underground cable in Europe. In the past ten years there has been a 73.1% rise in underground cabling. Denmark, for example, now has 19.43% of all of its transmission lines underground.

The UK has 8.04%. In France, 25% of all high tension lines must now be placed underground. Even in Ireland, we see from EirGrid statistics that 5.01% of these lines are underground. Importantly, Eirgrid has already announced that it proposes to build a 30 km underground cable from Rush, County Dublin, to Batterstown, County Meath.

COST

Firstly, cost issues cannot supersede health concerns and destruction of heritage and environment. Secondly, the relevant cost is not the cost to Eirgrid but the overall cost to Irish citizens taking into account, *inter alia*, the devaluation of homesteads and damage to the tourist industry.

Eirgrid constantly claims that undergrounding will cost three times the overhead figure. This figure is itself arguable. However, it is the UPFRONT cost to Eirgrid only. There are considerable savings in undergrounding *over the 30 year life cycle of the project*. It is arguable that there is no difference *even in the cost to Eirgrid over a 30 year cycle*. The cost to *Irish citizens* over the 30 year cycle could be less than the overhead option.

But this, as in the case of other issues, must be *independently* assessed.

INDEPENDENT ASSESSMENT

EIRGRID and the government cannot be judges in their own cause.

Workers and Unemployed Action calls on Eirgrid and the Government to defer the closing date for submissions and to suspend this project pending the outcome of a comprehensive feasibility study including cost assessment to Irish citizens (not just to Eirgrid), risk assessment including health issues, and environmental impact assessment, carried out **independently**¹ of Eirgrid and the Department of Communications, Energy, and Natural Resources, into the laying of these lines underground and under sea and of the carrying of these lines on pylons over-ground.

There can be significant bias even in scientific studies when these are carried out at the behest of interested parties¹

This matter is of such importance to the future of our country and above all to the health of our citizens that all interested parties must be allowed to make submissions, written and oral, and to call expert witnesses, to an independently constituted assessment group.

Advisory Committees: A case study of the WHO's Electromagnetic Field (EMF) Task Group

SIGNED:

CLER. PATRICK ENGLISH. M.C.C.

CLER. BRIAN O'DONNELL

CLER. BILLY SHOWN

CLER. THUNDERGEE

CLER. JESSA RYAN

CLER. LEANNE HEALEY T.D.