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MEMO

From: Sam Foster MLA
Minister of the Environment

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cc: See attached overleaf

Date: *24th* April 2001

To: First Minister/Deputy First Minister

FOOT AND MOUTH DISEASE: ENVIRONMENTAL AND PUBLIC HEALTH FACTORS

1. You and colleagues will be aware of the mounting concern in Great Britain about the air pollution and public health risks associated with Foot and Mouth pyres, particularly relating to dioxin emissions.
2. There are also risks to watercourses arising from the burial of carcasses. This is a risk of environmental pollution in the first instance, but it could have public health consequences also, if public or private drinking water supplies were affected.
3. The UK Government is reported as taking the lines that:-
 - (a) dioxin emissions are not jeopardising public health;
 - (b) burning, especially for old cattle, is an essential means of disposal;
 - (c) Ministers are preparing new guidelines to protect public health, to include provision for smaller, less polluting pyres; but
 - (d) among the disposal options, **none are risk free.**

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4. Nonetheless, the North Cumbria Health Authority intervened to ask MAFF to reconsider burning pyres until the health risks were confirmed. It has been reported that one unlit pyre of approximately 750 sheep was dismantled and the carcasses buried.

NI response to date

5. Locally, the Environment Committee has asked my Department for information on reports that DARD and DOE were liaising on the use of landfill sites for the disposal of culled stock. I am sure that this is the precursor to wider expressions of public concern about the health and environmental implications of our FMD policy. These could arise in acute form if we were to decide either on large-scale burning of carcasses on farms or on mass burials. Local residents are bound to have fears about such options, as yesterday's events at Coagh illustrate.
6. The scale of slaughter in NI has been proportionately much less than in GB, and the environmental and public health risks correspondingly lower. However, it is worth setting out what the three main methods of carcass disposal entail:-

(a) burning of carcasses and burial of ash on the farm

Air Pollution

The Department of the Environment has no specific statutory responsibility for the control of air pollution derived from the burning of animal carcasses in pyres, although we have a substantive concern about air pollution in general. District Councils are responsible for dealing with local air quality concerns under clean air and statutory nuisance provisions. Provision of advice on health effects of burning carcasses on pyres to District Council environmental health departments falls to DHSSPS.

Water Pollution

Burning of carcasses on pyres and the subsequent burial of ash at the burning site has the potential to pollute surface and ground waters. The Environment and Heritage Service of DOE has a regulatory responsibility in this area. EHS provides guidance to DARD on the siting of pyres to minimise risks of water pollution. If there appears to be a likelihood of pollution of ground or surface water, DOE has powers to intervene.

(b) rendering of carcasses and disposal of remains in landfill sites.

This has been the normal method of disposing of animals culled on a precautionary basis. It requires the carcasses to be transported to a rendering plant, and is understood to be effective in destroying the virus. Rendering plants are authorised, in respect of their air pollution potential, by District Councils. They may also require a Water Act discharge consent from EHS.

The rendered remains can in principle be stored, but ultimately will require disposal. Landfill in a waste disposal site is the only practical option at present (apart from remains derived from older cattle); incineration could be acceptable but there are no suitable plants in Northern Ireland.

Waste disposal sites in Northern Ireland are consented by DOE under Planning and Water Act legislation, and licensed by District Councils subject to legally enforceable conditions.

(c) mass burial of untreated carcasses off the farm

The capacity of rendering plants to process large volumes of material is limited, and the need could rapidly exceed it if a decision were to be taken to extend the precautionary cull substantially. Burying large numbers of

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untreated carcasses in new mass burial sites or existing landfill sites is, therefore, being considered, but it raises significant environmental and, potentially, public health issues.

Since development of a mass burial site would probably be undertaken by a Government Department, it may be feasible to make use of Crown Exemption to avoid the need for planning permission, but this would not obviate the need for a proper assessment of the environmental impact and risks to be prepared by the proposing Department.

Future Policy

7. The risks to the environment and to public health could increase if, for whatever reason, the scale of slaughter were to increase significantly in NI. This could put pressure on rendering capacity (the best environmental and public health option) and increase the need for pyres and/or burial as a means of disposal.
8. In those circumstances, the Executive's decision-making would need to give even greater weight to these factors; and to consider again the balance between them and the objective of protecting the agriculture industry and the economic interests of the farmers.

Conclusion

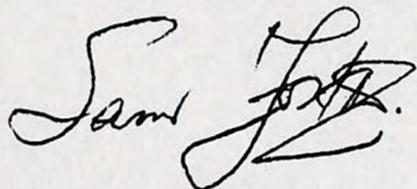
9. I am conscious that I have referred to issues which relate to the responsibilities of DARD and DHSSPS as well as my own environmental protection and planning responsibilities. Indeed I understand that DHSSPS is to bring forward further advice on the public health issues, and I would welcome this. FMD is an issue of such importance that it requires the continuing attention of the Executive Committee as a whole.

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10. My purpose in writing is:-

- (a) to emphasise the need for the public health and environmental factors to be identified and weighted in a transparent way by the Executive;
- (b) to register the statutory requirements attaching to various disposal options;
- (c) to highlight the likelihood of growing public and Assembly concern; and
- (d) to raise as a matter for further consideration whether and in what circumstances a vaccination policy, which would reduce the public health and environmental concerns, ought to be given further consideration, taking account of its economic implications also.

11. I would find it helpful if we addressed these points at our next Executive Committee discussion on FMD. In the meantime my Department will continue to provide maximum support to DARD and others in dealing with the crisis.



SAM FOSTER MLA
Minister of the Environment

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