

**Kathryn Sinnott, MEP, St Josephs, Ballinabearna, Ballinhassig,
Co. Cork (021)4888503; email:kathysinnott@iol.ie**

Sub (1)

IPC Licensing Section
Environmental Protection Agency
Johnstown Castle
Co. Wexford

08/09/2004

Date: 08 September 2004-09-08

**Re: Application to the Environmental Protection Agency by Shannon
Vermi-composting Limited for a Waste Licence, in respect of Waste
recovery/Disposal Activities (other than landfill), to compost 20,000
tonnes of waster per annum at Coolross, Rathcabbin, Roscrea, Co.
Tipperary. EPA file No. 209-1.**

As a member of the European Parliament's Committee on the Environment and Public Health and MEP for the area concerned, I would urge the EPA to reject this application. I have met with Community representatives from Rathcabbin and viewed the site from adjacent properties. I observed the scale of the operation and experienced first-hand the awful stench in the area at the Rathcabbin site. I share the Community's concerns and support their objections to operations at this site. I would urge rejection of this application on the following grounds:


1. North Tipperary Council has refused planning Permission to this applicant in respect of the application on which this EPA Application is based. This application was for retention of unauthorised developments and for additional new development. The application was rejected on the following grounds:
 - The proposed development would contravene materially the policies of the County Development Plan, would reduce the safety of other road users, would result in the creation of a traffic hazard and would

therefore be contrary to the proper planning and sustainable development of the area.

- The proposed development is in close proximity to residential properties and would give rise to a significant increase in activities at the site, would give rise to foul odours and smells, dust and noise resulting in significant detrimental harm being caused to the surrounding amenities and would depreciate the value of property in the area.
 - It is the policy of the County Council to prevent development within the rural area that would conflict with adjoining land uses. Specifically developments which might give rise to noxious gases, smells, noise or other disturbance of surrounding areas will not be allowed to locate where they might cause nuisance to nearby residents or users of recreational areas, or damage to crops or farm animals. The permitted development on the site is agricultural with ancillary vermin-composting activity. Having regard to the documentation submitted with the application the county council is not satisfied that the proposed development, which would result in a significant intensification of composting activities at the site from that permitted would not cause detrimental harm to other land uses and rural amenity. The proposed development is not in accordance with the objectives of the County Development Plan and would therefore be contrary to the proper planning and sustainable development of the area.
2. The industrial composting complex described in the application is not compatible with the rural area in question from any stand point-visual impact, scale, usage etc.
 3. The current Planning Permission attached to this site is not being complied with, North Tipperary County Council issued an Enforcement Notice to this operation in respect of PLC/24499, the planning permission currently attached to this site as granted in 2002. The council is currently seeking a court injunction in relation to operations at this site.
 4. The current waste Permit (WPTN08) for 1,000 tonnes that was granted by North Tipperary County Council in 2002 is not being complied with. WPTN08 is for 1,000 tonnes of waste per annum (maximum). The EPA Application itself states that 2,264 tonnes of waste was accepted in 2003, in contravention of WPTN08. WPTN08 also states that the site must be in conformity with PLC/24499 before waste was even to be accepted under WPTN08. This clearly not the case.

5. The Little Brosna Callows Natural Heritage Area and Special protection Area is approximately 500 metres from this site. It is an internationally important site because of the protected habitat itself and also the large number of protected and endangered Bird species therein, as listed on Annex 1 of the EU Birds Directive, in addition to other species of international, national and regional importance. It is not even mentioned in the potential to have serious adverse effect on the Callows NHA/SAP. Such areas like the above are taken very seriously by Europe to protect them.
6. The site poses an unacceptable risk to groundwater quality in the Rathcabbin area and contamination of the water poses a significant health risk. In addition, emissions from such waste processing facilities can have serious effects on public health. Composting release significant of Ammonia, which is linked with respiratory problems. It also releases various fungal spores such as aspergillus fumigatus that can lead to serious lung diseases. These diseases are allergic asthma, alveolitis, allergic bronchopulmonary aspergillosis and invasive aspergillosis. The latter is of special concern as it can have fatal consequences for people whose immune systems are compromised under no circumstances can these people be put further at risk.
7. Given the non-compliance with current planning permission and waste permit, it is clear that this operation cannot be relied on to adhere to any conditions attached to an EPA licence. Therefore I would urge the EPA not to give a licence of any size or quantity to this operation.

Yours sincerely,



Kathy Sinnott, MEP